IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No. CR 18-14-GF-BMM
)
STANLEY PATRICK WEBER,)
)
Defendant.)

MOTION FOR DISCLOSURE PURSUANT TO RULES 404(b) AND 609, FEDERAL RULES OF EVIDENCE

COMES NOW the Defendant, Stanley Patrick Weber, by and through his attorney, Ryan T. Cox, of the law firm of Springer and Steinberg, P.C., and pursuant to the provisions of Rules 404(b) and 609 of the Federal Rules of Evidence, hereby moves this Honorable Court for the entry of an Order compelling and directing the United States Government to disclose the following information to the Court and defense counsel:

- 1. Any evidence the Government intends to introduce against this Defendant regarding prior or subsequent criminal conduct and/or "bad acts" which is not charged in the Indictment herein and not alleged as part of any conspiracy charged in the Indictment herein;
- 2. Any evidence the Government intends to introduce against this Defendant pursuant to Rules 404(b) and 609 of the Federal Rules of Evidence;

- 3. Any evidence the Government intends to introduce against any party initially charged in the Indictment herein regarding prior or subsequent criminal conduct and/or "bad acts" which is not charged in the Indictment herein and not alleged as part of any conspiracy charged in the Indictment herein;
- 4. Any evidence the Government intends to introduce against <u>any</u> party initially charged herein pursuant to Rules 404(b) and 609 of the Federal Rules of Evidence;
- 5. Any evidence the Government intends to introduce concerning a co-conspirator(s) (regardless of whether said co-conspirator(s) was charged or named in the Indictment herein) regarding prior or subsequent criminal conduct and/or "bad acts" which is not charged in the Indictment herein and not alleged as part of any conspiracy charged in the Indictment herein;
- 6. Any evidence the Government intends to introduce concerning a co-conspirator(s) (regardless of whether said co-conspirator(s) was charged or named in the indictment herein) pursuant to Rule 404(b) and 609, F.R.E.

WHEREFORE, the Defendant prays for the relief requested, and for such other and further relief as to the Court sees just and proper in the premises.

Dated this 13th day of April, 2018.

Respectfully submitted,

/s/ Ryan T. Cox

Ryan T. Cox,

Admitted Pro Hac Vice

Colorado Bar Number 49882;

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April, 2018, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties entered in the case.

/s/ Ryan T. Cox

Ryan T. Cox,

Admitted Pro Hac Vice

Colorado Bar Number 49882;

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